

IN THE MATTER OF DETERMINING  
Whether there has been a violation of the  
Escrow Agent Registration Act of Washington by:  
  
International Escrow Inc.; and  
Grigory Yelkin, Ben Tran, and Slava Dekman,  
Principals,  
  
Respondents.

CONSENT ORDER  
BETWEEN THE DEPARTMENT AND

Respondents.

## AGREEMENT AND ORDER

CONSENT ORDER  
GRIGORY YELKIN

Based upon the foregoing:

A. **Jurisdiction.** It is AGREED that the Department has jurisdiction over the subject matter of the activities discussed herein.

B. **Conditions Are Binding.** It is AGREED that the parties shall be bound by the terms and conditions of this Consent Order as set forth herein.

C. **Waiver of Hearing.** It is AGREED that Respondent Yelkin has been informed of his right to a hearing before an administrative law judge, and that he has waived his right to a hearing and any and all administrative and judicial review of the issues raised in this matter, or of the resolution reached herein.

D. **Non-Compliance with Order.** It is AGREED that Respondent Yelkin understands that failure to abide by the terms and conditions of this Consent Order may result in further legal action by the Director. In the event of such future legal action, Respondent Yelkin may be responsible to reimburse the Director for the cost incurred in pursuing such action, including but not limited to, attorney fees.

E. **Declaration.** It is AGREED that Respondent Yelkin has provided the Department a declaration dated 5 January, 2004, in which Respondent Yelkin states in part:

- Respondent Yelkin was a principal of International Escrow Inc. ("International") when it applied for an escrow agent license with the Department on or about April 12, 1999.
- Respondent Yelkin's ownership interest in International terminated on or around February 8, 2000. At the time he sold his interest in the company, he understood and believed that International would accomplish all necessary steps to report the change to the Department.
- Respondent Yelkin had no knowledge of the activities of International following the termination of his ownership interest, including, but not limited to, operating without a Designated Escrow Officer, failing to properly account for and administer funds held in trust, failing to pay annual license fee, maintenance of surety bonds and engaging in business without a license.
- Respondent Yelkin is not, as of the date of entry of this Consent Order, participating in the escrow industry in Washington, and has not done so since terminating his ownership interest in International Escrow Inc. in or about February 2000.

It is further AGREED that a true and accurate copy of that same declaration dated is attached hereto and incorporated by this reference as if fully set forth herein.

1 F. **Acknowledgement.** The Department ACKNOWLEDGES that, as of the entry of this Consent Order,  
2 available evidence does not indicate that Respondent Yelkin was involved in the violations alleged in the Statement of  
3 Charges.

4 G. **Compliance with the Law.** Respondent Yelkin AGREES that, in the future, should he wish to participate  
5 in the escrow industry in Washington as a Designated Escrow Officer or in any other capacity, he shall fully and  
6 completely comply with the Escrow Agent Registration Act and the rules adopted thereunder, and any and all other  
7 relevant statutes and regulations in place at that time.

8 H. **Future Application for License.** It is AGREED that the conduct giving rise to the issuance of the above-  
9 referenced Statement of Charges will not be considered by the Department in the assessment of any future application  
10 for an escrow agent license in the state of Washington, in the event Respondent Yelkin wishes to pursue such  
11 application.

12 I. **Voluntarily Entered.** It is AGREED that Respondent Yelkin has voluntarily entered into this Consent  
13 Order, which is effective when signed by the Director's designee.

14 J. **Understanding of Consent Order.** It is AGREED that Respondent Yelkin has read the Consent Order in  
15 its entirety and fully understands and agrees to all of the same.

16 **RESPONDENT:**

17  
18 /C/ \_\_\_\_\_  
19 Grigory Yelkin

01/05/04  
Date

20  
21 THIS ORDER ENTERED THIS 20<sup>th</sup> DAY OF January, 2004.

22  
23 /C/ \_\_\_\_\_  
24 Chuck Cross  
25 Acting Director and Enforcement Chief  
Division of Consumer Services  
Department of Financial Institutions